

**BELLSOUTH**

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June 15, 1999

RECEIVED

JUN 15 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> St. S.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

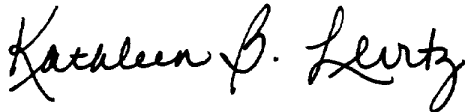
Re: Written Ex Parte in CC Docket No. 98-121 and  
CC Docket No. 98-56 /

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Dr. Daniel Shiman and Ms. Claudia Pabo of the Common Carrier Bureau's Policy and Program Planning Division. That ex parte consists of copies of orders issued by the North Carolina Public Utility Commission, the Mississippi Public Service Commission, and the Louisiana Public Service Commission discussing BellSouth performance measurements used to determine whether BellSouth is meeting the parity obligations imposed by Sections 251 and 271 of the Communications Act of 1934, as amended. This information has been submitted in response to Dr. Shiman's request.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this notice and that written ex parte presentation in both the dockets identified above. Please associate this notification with the record in both those proceedings.

Sincerely,



Kathleen B. Levitz  
Vice President - Federal Regulatory

Attachments

cc: Daniel Shiman (without attachments)  
Claudia Pabo (without attachments)

Kathleen B. Levitz  
Vice President-Federal Regulatory

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June 15, 1999

Dr. Daniel Shiman  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RECEIVED

JUN 15 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Written Ex Parte in CC Docket No. 98-121 and  
CC Docket No. 98-56

Dear Dr. Shiman:

You had asked that BellSouth send you copies of state commission orders discussing performance measurements that would demonstrate BellSouth's compliance with the parity obligations of Sections 251 and 271 of the Communications Act of 1934, as amended. Based upon our review of our docket records, it appears that at this time the public service commissions of Georgia, Louisiana, Mississippi and North Carolina are the only ones within BellSouth's service territory that have issued orders discussing service performance measurements. In partial response to your request, on June 11, 1999, I sent you the order issued by the Georgia Public Service Commission prescribing such performance measurements. Attached are copies of the remaining state commission orders containing discussions of BellSouth performance measurements, as well as the Statements of Generally Available Terms and Conditions (SGATs) that the orders were reviewing:

- Order in North Carolina Utility Commission Docket No P-55, SUB 1022, issued on January 14, 1998, and the BellSouth SGAT that the order reviewed;
- Order in Mississippi Public Service Commission Docket No. 97-AD-0321 issued on November 9, 1998, and the BellSouth SGAT that the order reviewed;
- General Order in Louisiana Public Service Commission Docket No. U-22252 (Subdocket C) decided August 19, 1998 and the BellSouth SGAT that the order reviewed.

If after reviewing the attachments you find that you need additional information on these docketed proceedings, please call me at (202) 463-4113.

In compliance with the Commission's rules, I have today filed with the Secretary of the Commission two copies of this written ex parte presentation in both CC Docket No. 98-56 and CC Docket No. 98-121 and requested that it be associated with the record of both dockets.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen B. Levitz". The signature is written in black ink and is positioned above the printed name and title.

Kathleen B. Levitz  
Vice President – Federal Regulatory

Attachments

cc: Claudia Pabo

# LOUISIANA PUBLIC SERVICE COMMISSION

## GENERAL ORDER

**Louisiana Public Service Commission, ex parte. Docket No. U-22252 (Subdocket-C) In re: BellSouth Telecommunications, Inc. Service Quality Performance Measurements.**

(Decided at the August 19, 1998 Open Session)

On April 30, 1998, BellSouth Telecommunications, Inc. (BST or BellSouth) filed two revisions to its Statement of Generally Available Terms and Conditions (SGAT), including a proposal for Service Quality Performance Measurements (SQPM). At the June 17, 1998 Business and Executive Session, the Louisiana Public Service Commission (LPSC or Commission) adopted on an interim basis the SQPM filed by BellSouth.<sup>1</sup> The Commission further ordered that a rule making proceeding be commenced and completed to determine final SQPM for presentation at the August 19, 1998 Business and Executive Session.<sup>2</sup>

Louisiana Public Service Commission Staff (Staff) immediately published the opening of the above referenced docket and a request for comments in the next LPSC Bulletin dated June 26, 1998 following the June Business and Executive Session. Staff received comments on July 10, 1998 from e.spire, BST, MCI, Cox and AT&T and Direct Testimony of Melissa L. Closz from Sprint and Venetta Bridges from MCI. Reply comments were received on July 20, 1998 from AT&T, e.spire, Sprint and BST and Reply Testimony of Venetta Bridges with MCI. A technical conference was held on July 23, 1998. Staff requested additional comments on July 28, 1998 from any party with additional information on statistics, penalties and levels of disaggregation. Staff received additional comments from BST, MCI, AT&T and Intermedia Communications. Pursuant to the procedural schedule in the above referenced docket, BST, MCI, AT&T, Sprint, e.spire, and Cox filed reply comments to Staffs initial recommendation on August 10, 1998.

After examining the Parties' comments, reply comments, post-technical conference comments, reply comments to Staffs initial recommendation, and holding a technical conference, Staff issued the attached final recommendation concerning the BST SQPM.

Staff found that the Telecommunications Act of 1996 (the Act) requires that incumbent local exchange carriers (ILEC) provide services and facilities in a nondiscriminatory manner and on a just and reasonable basis.<sup>3</sup> Staff further found that these provisions of the Act are designed to hasten the development of competition in local exchange markets by ensuring incumbent carriers do not provide services and facilities in a manner that favor their own retail operations over competing carriers, or in a

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<sup>1</sup> See Louisiana Public Service Commission Order No. U-22252-B, dated July 1, 1998.

<sup>2</sup> Id.

<sup>3</sup> 47 U.S.C. 251(c)(3) and (4).

manner which favors certain competing carriers over others.<sup>4</sup> More simply, an ILEC must provide services and facilities to competitive local exchange carriers (CLECs) that are at least equal in quality to that provided by the ILEC to itself or to any affiliate, subsidiary, or any other party to which the ILEC provides service.<sup>5</sup> Finally, Staff found that adequate performance measurements and standards for UNEs and resold services are essential to the immediate development of local competition in the State of Louisiana.

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<sup>4</sup> *In the Matter of Application by BellSouth Corporation, et al., Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In -Region, InterLATA Services in Louisiana*, CC Docket No. 97-23 1 (Rd. Feb. 4, 1998) pan. 20,23,33.

<sup>5</sup> Id.

Staffs final recommendation includes recommendations on performance measurements, levels of disaggregation, including product disaggregation and geographic disaggregation, standards and benchmarks, statistical tests, reporting, auditing and data detail, enforcement, dispute resolution and a procedural schedule.

Staffs recommendation (attached as Exhibit A) is summarized in 12 points as follows: Staff recommended that the Commission (1) adopt the performance measurements attached as exhibit A to this recommendation. The measurements found in Exhibit A are those measurements submitted in BellSouth's proposal which have been modified as indicated in Exhibit A; (2) order the following levels of product disaggregation for provisioning, maintenance and repair performance measurement categories: resale<sup>6</sup> residential POTS, resale business POTS, resale ISDN, resale Centrex, resale PBX, other resale, unbundled loops 2-wire - w/interim number portability and - w/o interim number portability, unbundled loops all other - w/interim number portability and - w/o interim number portability, unbundled ports, interconnection trunks; (3) order BellSouth to report its performance measurements at the regional, state, and MSA. MSA level reporting is only required where work is actually performed at that level. MSA level of reporting would also apply only to the following categories of performance measurements: provisioning, repair and maintenance, and trunk groups; (4) establish performance benchmarks only where no analogous retail service exist by ordering BellSouth to conduct special studies to establish the benchmark performance level.<sup>7</sup> Such studies should rely on experiences drawn from BST's operations and be completed by November 30, 1998; (5) that a standard cutover time of five minutes, not to exceed fifteen minutes, be set as the standard for BellSouth to perform a loop cutover, including number portability; (6) order BellSouth to perform the statistical testing that it proposes (statistical process control), the modified z-test endorsed by the CLECs, and the pooled variance test offered by the FCC in its Notice of Proposed Rulemaking, Appendix B<sup>8</sup> so the competence of each test can be demonstrated over a reasonable period of time; (7) that BellSouth perform its proposed statistical test, the modified z-test endorsed by LCUG, and the FCC's proposed pooled variance test for those performance measurements where a retail analog exists, and where there is not an average computed<sup>9</sup> (8) that BellSouth collect the data necessary to run all three statistical tests for the following performance measurements which compute an average: Average OSS Response Interval-PreOrder and Ordering, Average Completion Interval-Provisioning, and Maintenance Average Duration.; (9) that reports on performance measurements be provided monthly to the Commission and each requesting CLEC indicating BellSouth's own internal performance, its performance for any BellSouth affiliate, its performance for all CLECs in aggregate, and its performance for the individual CLEC requesting the report and that BellSouth be required to maintain all data and information used in the compilation of the performance measurements and develop any necessary tracking systems; (10) that if a CLEC detects potential discrepancies between the CLEC's internally generated data and the data relied upon by BellSouth in the reporting process, the affected CLEC should be permitted to audit the data

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<sup>6</sup> All resale measurements should also report for dispatched and non-dispatched service.

<sup>7</sup> Staff recommends that the commission set benchmarks. However, reasonable benchmarks cannot be set unless BST conducts a special study of its internal operations.

<sup>8</sup> The addition of the FCC's pooled variance test was done at the suggestion of BellSouth's expert, Bill Stacy, in a telephone conference between Staff and BellSouth on August 10th.

<sup>9</sup> It appears to Staff that any undue burden placed on BellSouth only relates to measurements where an average is computed. Consequently, running a z-test and pooled variance test on these other measurements does appear to be a burdensome request.

collection, computation and reporting processes of BellSouth within fifteen days of a written request, that those costs will be borne by the CLEC, that an annual comprehensive audit of BellSouth's performance performance measurements for both BellSouth and CLECs will occur for each of the next five years, that the audit be conducted by an independent third party, the results of the audit be made available to all parties, that the cost be borne 50% by BellSouth and 50% by the CLECs, that the selection of the independent third party audit be done with input from both BellSouth and the CLECs, that the scope of the audit be jointly determined by BellSouth and the CLECs, that the audit be done on a company-wide basis because small start-up CLECs may not have the resources to conduct audits, monitor performance, and detect discrimination; (11) adopt the recommended procedure for dispute resolution as follows: When a performance dispute arises, the aggrieved party must send written notice of the problem with a request for resolution to BellSouth. Service of the notice and request for resolution commences a fifteen day time period within which resolution of the problem should occur. BellSouth and the CLEC must assemble a Joint Investigative Team comprised of subject matter experts. The team must be co-chaired by a representative of BellSouth and the CLEC. A root-cause analysis must be conducted to determine the source of the problem. From this analysis a plan should be developed to remedy the problem. If the dispute cannot be resolved within 15 days, then either party may file a formal complaint with the Commission through the Division of Administrative Hearings. The ALJ assigned to the complaint should rule within 15 days of its filing. If either party disagrees with the ALJ ruling, the party may then appeal to the Commission; (12) that a detailed telephone Status Conference be held on September 15, 1998 to address scheduling of workshops, timing of studies that need to be undertaken, and further details of the issues that need to be addressed. Also, Staff recommends that a workshop schedule be established as follows: October - address issues of disaggregation and clarification of performance measurements; November - address statistical testing; December - address retail analogs; January - address enforcement and dispute resolution; February - address any remaining issues not resolved or completed in earlier workshops; and March - Staff will issue its Recommendation on issues agreed to by the Parties and any issues that require resolution by the Commission.

This matter was considered at the Commission's Open Session held on August 19, 1998. On motion of Commissioner Owen and seconded by Commissioner Dixon, and adopted by a unanimous vote, the Commission voted to accept the staff recommendation.

**IT IS THEREFORE ORDERED THAT:**

Staff's recommendation as set forth in Exhibit A, attached, is hereby adopted.

**BY ORDER OF THE COMMISSION  
BATON ROUGE, LOUISIANA  
August 31, 1998**

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**/S/DON OWEN  
DON OWEN, CHAIRMAN  
DISTRICT V**

**/S/IRMA MUSE DIXON  
IRMA MUSE DIXON, VICE-CHAIRMAN DISTRICT III**

**/S/ C. DALE SITTIG**

**C. DALE SITTIG, COMMISSIONER DISTRICT IV**

**/S/ JAMES M. FIELD**

**JAMES M. FIELD, COMMISSIONER DISTRICT II**

**/S/JACK "JAY" A. BLOSSMAN. JR.**

**JACK "JAY" A. BLOSSMAN, JR., COMMISSIONER  
DISTRICT I**



Service List

Docket No. U-22252 Subdocket C

Commissioners

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Edward Gallegos -LPSC Utilities Division

Arnold Chauviere, LPSC Utilities Division

Stanley Perkins -LPSC Auditing Division

Farhad Niami -LPSC Economic Division

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I -David Guerry, Long Law Firm, Two United Plaza, Suite 800, 8550 United Plaza Blvd., Baton Rouge, LA 70809-7013 (Rep. AT&T)

I -William R. Atkinson, Sprint, 3100 Cumberland Circle, Atlanta, GA 30339 I -

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(822 Harding St., Lafayette, LA 70503) (Rep. LDDS WorldCom)

I -Robert L. Rieger, Jr., Adams & Reese, Premier Tower, 19th Floor, 451

Florida St., Baton Rouge, LA 70801 (Rep. LA Cable Telecommunications)

I -Victoria McHenry, BellSouth Telecommunications, 365 Canal St., Suite 3060 New Orleans, LA 70130-1102

I -Katherine W. King, Kean, Miller, Hawthorne, D'Armond, McCowan & Jarman P.O. Box 3513, Baton Rouge, LA 70821 (Rep. MCI)

I -Allen Hubbard, Access Network Services, Inc., P.O. Box 10804, Chantilly, Va 20153

I -W. Glenn Burns, Hailey, McNamara, Hall, Larmarm & Papale, L.L.P., P.O. Box 8288 Metairie, La. 70011-8288 (Rep BellSouth Long Distance) I -

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I -Linda L. Oliver, Steven F. Morris, Hogan & Hartson, L.L.P., 555 13th St., N.W., Washington, DC 20004 (Rep. CompTel)

I -Enrico C. Soriano, Kelley Drye & Warren, 1200 19th St., N.W., Suite 500, Washington, DC 20036 (Rep. Intermedia Communications -SGAT)

I -Morton J. Posner, Swidler & Berlin, 3000 K St., N.W., Suite 300, Washington, DC 20007-5116 (Rep. Entergy-Hyperion Telecommunications of Louisiana, L.L.C.)

I -Ashton Hardy, Hardy & Carey, 111 Veterans Memorial Blvd., Metairie, LA 70005 (Rep. Radiofone)

I -Daniel J. Shapiro, Gordon, Arata, McCollam & Duplantis, L.L.P., 1420 One American Place, Baton Rouge, LA 70825

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IP -Jessica Lambert, 18547 Greenbriar Estates, Prairieville, LA 70769

IP -Booker T. Lester, Jr., Communications Workers of American, Afl-CIO, 2750 Lake Villa Dr., Suite 204, Metairie, LA 70002

IP -Anu Seam, US Department of Justice, Anti-Trust Division, 1401 H Street, N.W., Suite 8000, Washington, DC 20530

I -Martha McMillin, MCI Telecommunications Corp., 780 Johnson Ferry Rd., Suite 700, Atlanta, GA 30342

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Exhibit A

**PRE-ORDERING AND ORDERING OSS**

<b>Function:</b>	Average Response Interval for Pre-Ordering and Ordering & OSS Interface Availability
<b>Measurement Overview:</b>	As an initial step of establishing service, the customer service agent must establish such basic facts as availability of desired features, likely service delivery intervals, the telephone number to be assigned, product and feature availability, and the validity of the street address. Typically, this type of information is gathered from the supporting OSS's while the customer (or potential customer) is on the telephone with the customer service agent. This information may be gathered via stand-alone pre-order inquiries or as part of the ordering function. Pre-ordering/ordering activities are the first contact that a customer may have with a CLEC. This measure is designed to monitor the time required for the CLEC interface systems to obtain from legacy systems the pre-ordering/ordering information necessary to establish and modify service. This measurement also captures the availability percentages for the BST systems that the CLEC uses during pre-ordering and ordering. Comparison to BST results allow conclusions as to whether an equal opportunity exists for the CLEC to deliver a comparable customer experience.
<b>Measurement Methodology:</b>	<p>1. Average OSS Response Interval = <math>\text{Sum}[(\text{Date \&amp; Time of Legacy Response}) - (\text{Date \&amp; Time of Legacy Request})] / (\text{Number of Legacy Requests During the Reporting Period})</math></p> <p>The response interval for retrieving pre-order/order information from a given legacy is determined by summing the response times for all requests (contracts) submitted to the legacy during the reporting period and then dividing by the total number of legacy requests for the reporting period. For that day<sup>1</sup>. The response interval starts when the client application (LENS for CLECs; RNS for BST) submits a request to the legacy system and ends when the appropriate response is returned to the client application. The number of legacy accesses during the reporting period that take less than 2.3 seconds and the number that take more than 6 seconds are also captured.</p> <p>Definition: Average response time for accessing legacy data associated with appointment scheduling, service &amp; feature availability, address verification, request for Telephone Numbers (TNs), and Customer Service Records (CSRs).</p> <p>2. OSS Interface Availability = <math>(\text{Actual Availability}) / (\text{Scheduled Availability}) \times 100</math></p> <p>Definition: Percent of time OSS interface is actually available compared to scheduled availability. Availability percentages for CLEC interface systems and for all legacy systems accessed by them are captured.</p>

<sup>1</sup> Change reflects a clarification. The metric is measured for the reporting period, however the discussion indicated the number of requests for a day. General Order dated August 31, 1998

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Exhibit A

PRE-ORDERING AND ORDERING OSS

<b>Reporting Dimensions:</b>	<b>Excluded Situations:</b>
<ul style="list-style-type: none"> <li>• Not CLEC specific.</li> <li>• Not product/service specific.</li> <li>• Regional Level</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Data Retained Relating to CLEC Experience:</b>	<b>Data Retained Relating to BST Performance:</b>
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• Legacy contract type (per reporting dimension)</li> <li>• Response interval</li> <li>• Regional Scope</li> </ul>	<ul style="list-style-type: none"> <li>• Report Month</li> <li>• Legacy contract type (per reporting dimension)</li> <li>• Response interval</li> <li>• Regional Scope</li> </ul>

**LEGACY SYSTEM ACCESS TIMES FOR RNS**

System	Contract	Data	< 2.3 sec	> 6 sec	Avg. Sec	# of Calls
RSAG	RSAGTEN	Address	x	x	x	x
RSAG	RSAGADDR	Address	x	x	x	x
ATLAS	ATLASTN	TN	x	x	x	x
DSAP	DSAPDDI	Schedule	x	x	x	x
CRIS	CRSACCTS	CSR	x	x	x	x
OASIS	OASISNET	Feature/Svc	x	x	x	x
OASIS	OASISBSN	Feature/Svc	x	x	x	x
OASIS	OASISCAR	Feature/Svc	x	x	x	x
OASIS	OASISLPC	Feature/Svc	x	x	x	x
OASIS	OASISMTN	Feature/Svc	x	x	x	x
OASIS	OASISOCP	Feature/Svc	x	x	x	x

**LEGACY SYSTEM ACCESS TIMES FOR LENS**

System	Contract	Data	< 2.3 sec	> 6 sec	Avg. Sec	# of Calls
RSAG	RSAGTEN	Address	x	x	x	x
RSAG	RSAGADDR	Address	x	x	x	x
ATLAS	ATLASTN	TN	x	x	x	x
DSAP	DSAPDDI	Schedule	x	x	x	x
HAL	HALCRIS	CSR	x	x	x	x
COFFI	COFIUSOC	Feature/Svc	x	x	x	x
P/SIMS	PSIMSORB	Feature/Svc	x	x	x	x

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PRE-ORDERING AND ORDERING OSS

OSS Interface Availability

OSS Interface	% Availability
UENS	x
LLO Mainframe	x
LEO UNIX	x
LESOG	x
EDI	x
HAL	x
BOCRIS	x
ATLAS/COFFI	x
RSAG/DSAP	x
SOCS	x

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Exhibit A

**ORDERING**

<b>Function:</b>	Ordering
<b>Measurement Overview:</b>	When a customer calls their service provider, they expect to get information promptly regarding the progress on their order(s). Likewise, when changes must be made, such as to the expected delivery date, customers expect that they will be immediately notified so that they may modify their own plans. The order status measurements monitor, when compared to applicable BST results, that the CLEC has timely access to order progress information so that the customer may be updated or notified when changes and rescheduling are necessary.
<b>Measurement Methodology:</b>	<p>1. Percent Flow-through Service Requests = <math>\Sigma</math> (Total Number of <u>valid</u><sup>2</sup> Service Requests that flow-through to the BST OSS) / (Total Number of valid Service Requests delivered to BST OSS) X 100.</p> <p><b>Definition:</b> <u>Percent Flow-through Service Requests</u> measures the percentage of orders submitted electronically that utilize BSTs' OSS without manual (human) intervention.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Mechanized tracking for flow-through service requests and manual SOER error audit reports (3/31/98). Mechanized tracking for SOER errors and flow-through (4/30/98).</li> <li>• BST mechanized order tracking.</li> </ul> <p>2. Percent Rejected Service Requests = <math>\Sigma</math> (Total Number of Rejected Service Requests) / (Total Number of Service Requests Received) X 100.</p> <p><b>Definition:</b> <u>Percent Rejected Service Requests</u> is the percent of total orders received rejected due to error or omissions.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Manual tracking for non flow-through service requests</li> <li>• Mechanized tracking for flow-through service requests</li> <li>• BST retail report not applicable.</li> </ul> <p>3. Reject Interval = <math>\Sigma</math> [ (Date and Time of Service Request Rejection) - (Date and Time of Service Request Receipt) ] / (Number of Service Requests Rejected in Reporting Period). Requests are provided based on four (4) hour increments within a 24 hour period, along with the percent greater than 24 hours.</p> <p><b>Definition:</b> <u>Reject Interval</u> is the average reject time from receipt of service order request to distribution of rejection.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Non-Mechanized Results are based on actual data from all orders.</li> <li>• Mechanized Results are based on actual data for all orders from the OSS.</li> <li>• BST retail report not applicable.</li> </ul>

<sup>2</sup> Change reflects a clarification. The metric did not include the word "valid" in the numerator; however, "valid" was included in the denominator. Likewise, Staff added "total" in the numerator to be consistent with General Order dated August 31, 1998.

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Exhibit A

**ORDERING**

Measurement Methodology:	<p>4. Firm Order Confirmation Timeliness = <math>\Sigma [ (\text{Date and Time of Firm Order Confirmation}) - (\text{Date and Time of Service Request Receipt}) ] / (\text{Number of Service Requests Confirmed in Reporting Period})</math></p> <p>Definition: <u>Interval for Return of a Firm Order Confirmation (FOC Interval)</u> is the average response time from receipt of valid service order request to distribution of order confirmation. Results are provided based on four (4) hour increments within a 24 hour period, along with the percent greater than 24 hours.</p> <p>Methodology:</p> <ul style="list-style-type: none"><li>• Non-Mechanized Results are based on actual data from all orders.</li><li>• Mechanized Results are based on actual data for all orders from the OSS.</li><li>• BST retail report not applicable.</li></ul> <p>5. Speed of Answer in Ordering Center = <math>\Sigma (\text{Total time in seconds to reach LCSC}) / (\text{Total \# of Calls})</math> in Reporting Period.</p> <p>Definition: Measures the average time to reach a BST representative. This can be an important measure of adequacy in a manual environment or even in a mechanized environment where CLEC service representatives have a need to speak with their BST peers.</p> <p>Methodology:</p> <ul style="list-style-type: none"><li>• Mechanized tracking through LCSC Automatic Call Distributor.</li><li>• Mechanized tracking through BST retail center support systems.</li></ul>
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General Order dated August 31, 1998

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Exhibit A

**ORDERING**

Reporting Dimensions:	Excluded Situations:
<ul style="list-style-type: none"> <li>CLEC Specific</li> <li>CLEC Aggregate</li> <li>BST Aggregate (Where Applicable)</li> <li>State and Regional Level</li> <li><math>\leq 10</math> and <math>\geq 10</math> Circuit Categories not available in a pre completion order mode.</li> <li>Resale Res and Bus reporting categories require adherence to OBF standards.</li> <li>"Other" category reflects service requests which do not have service class code populated.</li> <li>Dispatch, No Dispatch <math>\leq 10</math> and <math>\geq 10</math> Circuit Categories not available in a pre completion order mode.</li> </ul>	<ul style="list-style-type: none"> <li>Firm Order Confirmation Interval: Invalid Service Requests, and orders received outside of normal business hours</li> <li>Percent Flow-through Service Requests: Rejected Service Requests</li> <li>% Rejected Service Requests: Service Requests canceled by the CLEC</li> <li>Supplements on Manual Orders</li> </ul>
Data Retained Relating to CLEC Experience:	Data Retained Relating to BST Performance:
<ul style="list-style-type: none"> <li>Report Month</li> <li>Interval for FOC</li> <li>Reject Interval</li> <li>Total number of LSRs</li> <li>Total number of Errors</li> <li>Adjusted Error Volume</li> <li>Total number of flow through service requests</li> <li>Adjusted number of flow through service requests</li> <li>State and Region</li> </ul>	<ul style="list-style-type: none"> <li>Report Month</li> <li>Interval for FOC</li> <li>Reject Interval</li> <li>Total number of LSRs</li> <li>Total number of Errors</li> <li>Adjusted Error Volume</li> <li>Total number of flow through service requests</li> <li>Adjusted number of flow through service requests</li> <li>State and Region</li> </ul>

**Percent Flow-Through Service Requests**

	Mechanical LSRs		BST Flow-Through
Local Interconnection Trunks	X	Residence	X
UNE	X	Business	X
Resale - Residence	X		
Resale - Business	X		
Resale - Special	X		
UNE - Loops w/LNP	X		
Other	X		

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**Percent Rejected Service Requests**

	Mechanized LSRs	Non-Mechanized LSRs
Local Interconnection Trunks	X	X
UNE	X	X
Resale - Residence	X	X
Resale - Business	X	X
Resale - Special	X	X
UNE - Loops w/LNP	X	X
Other	X	X

**Reject Distribution Interval and Average Interval**

	Mechanized LSRs	Non-Mechanized LSRs
Local Interconnection Trunks		
UNE	X	X
Resale - Residence	X	X
Resale - Business	X	X
Resale - Special	X	X
UNE - Loops w/LNP	X	X
Other	X	X

**Firm Order Confirmation Distribution Interval and Average Interval**

	Mechanized LSRs	Non-Mechanized LSRs
Local Interconnection Trunks	X	X
UNE	X	X
Resale - Residence	X	X
Resale - Business	X	X
Resale - Special	X	X
UNE - Loops w/LNP	X	X
Other	X	X

**Speed of Answer in Ordering Center**

	Ave. Answer time (Sec.) 7 month
LCSC	X
Residence Service Center	X
Business Service Center	X

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Function:	<b>Average Completion Interval and Order Completion Interval Distribution</b>
Measurement Overview:	The "average completion interval" measure monitors the time required by BST to deliver integrated and operable service components requested by the CLEC, regardless of whether resale services or unbundled network elements are employed. When the service delivery interval of BST is measured for comparable services, then conclusions can be drawn regarding whether or not CLECs have a reasonable opportunity to compete for customers. The "order completion interval distribution" measure monitors the reliability of BST commitments with respect to committed due dates to assure that CLECs can reliably quote expected due dates to their retail customer. In addition, when monitored over time, the "average completion interval" and "percent completed on time" may prove useful in detecting developing capacity issues.
Measurement Methodology:	<p>1. Average Completion Interval = <math>\Sigma [ (\text{Completion Date \&amp; Time}) - (\text{Order Issue Date \&amp; Time}) ] / (\text{Count of Orders Completed in Reporting Period})</math></p> <p>2. Order Completion Interval Distribution = <math>\Sigma (\text{Service Orders Completed in "X" days}) / (\text{Total Service Orders Completed in Reporting Period}) \times 100</math></p> <p>The actual completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from BST receipt of a syntactically correct order from the CLEC to BST's actual order completion date. Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed within the reporting period.</p> <p>The distribution of completed orders is determined by first counting, for each specified reporting dimension, the total numbers of orders completed within the reporting interval and the interval between the issue date of each order and the completion date. <i>D&amp;F orders where the CLEC serves as the agent for the end-user are included in this measurement.</i> For each reporting dimension, the resulting count of orders completed for each specified time period following the issue date is divided by the total number of orders completed with the resulting fraction expressed as a percentage.</p> <p>Definition: Average time from issue date of service order to actual order completion date.</p> <p>Methodology:</p> <ul style="list-style-type: none"> <li>Mechanized metric from ordering system</li> </ul>

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Reporting Dimensions:	Excluded Situations:
<ul style="list-style-type: none"> <li>CLEC Specific</li> <li>CLEC Aggregate</li> <li>BST Aggregate</li> <li>State, Regional, and <u>MSA</u><sup>3</sup> Level</li> <li>ISDN Orders included in Non Design - GA Only</li> <li>Dispatch/No Dispatch categories are not applicable to trunks.</li> </ul>	<ul style="list-style-type: none"> <li>Canceled Service Orders</li> <li>Initial Order when supplemented by CLEC</li> <li>Order Activities of BST associated with internal or administrative use of local services</li> </ul>
Data Retained Relating to CLEC Experience:	Data Retained Relating to BST Performance:
<ul style="list-style-type: none"> <li>Report Month</li> <li>CLEC Order Number</li> <li>Order Submission Date</li> <li>Order Submission Time</li> <li>Order Completion Date</li> <li>Order Completion Time</li> <li>Service Type</li> <li>Activity Type</li> <li>State, Region and <u>MSA</u><sup>4</sup></li> </ul>	<ul style="list-style-type: none"> <li>Report Month</li> <li>Average Order Completion Interval</li> <li>Order Completion by Interval</li> <li>Service Type</li> <li>Activity Type</li> <li>State, Region, and <u>MSA</u><sup>5</sup></li> </ul>

Order Completion Interval Distribution and Average Completion Interval

RESALE RESIDENCE	Same Day	1	2	3	4	5	>5	Average Completion Interval
Dispatch								
CLEC orders								
< 10 circuits	X	X	X	X	X	X	X	X
>= 10 circuits	X	X	X	X	X	X	X	X
BST orders								
< 10 circuits	X	X	X	X	X	X	X	X
>= 10 circuits	X	X	X	X	X	X	X	X
No Dispatch								
CLEC orders								
< 10 circuits	X	X	X	X	X	X	X	X
>= 10 circuits	X	X	X	X	X	X	X	X
BST orders								
< 10 circuits	X	X	X	X	X	X	X	X
>= 10 circuits	X	X	X	X	X	X	X	X

<sup>3</sup> MSA was added to reflect Staff's recommendation that geographic disaggregation reflect Metropolitan Statistical Areas.

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

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RETAIL BUSINESS	Same Day	1	2	3	4	5	>5	Average Completion Interval
Dispatch								
CLEC orders								
< 10 circuits	X	X	X	X	X	X	X	X
>= 10 circuits	X	X	X	X	X	X	X	X
BST orders								
< 10 circuits	X	X	X	X	X	X	X	X
>= 10 circuits	X	X	X	X	X	X	X	X
No Dispatch								
CLEC orders								
< 10 circuits	X	X	X	X	X	X	X	X
>= 10 circuits								
BST orders								
< 10 circuits	X	X	X	X	X	X	X	X
>= 10 circuits								

Order Completion Interval Distribution and Average Completion Interval

UNE NON DESIGN	0-5	6-10	11-15	16-20	21-25	26-30	>30	Average Completion Interval
Dispatch								
< 10 Circuits	X	X	X	X	X	X	X	X
>= 10 Circuits	X	X	X	X	X	X	X	X
No Dispatch								
< 10 Circuits	X	X	X	X	X	X	X	X
>= 10 Circuits	X	X	X	X	X	X	X	X

UNE DESIGN	0-5	6-10	11-15	16-20	21-25	26-30	>30	Average Completion Interval
Dispatch								
< 10 Circuits	X	X	X	X	X	X	X	X
>= 10 Circuits	X	X	X	X	X	X	X	X
No Dispatch								
< 10 Circuits	X	X	X	X	X	X	X	X
>= 10 Circuits	X	X	X	X	X	X	X	X

UNE LOOPS w/LNP	Same Day	1	2	3	4	5	>5	Average Completion Interval
Dispatch								
< 5 Circuits	X	X	X	X	X	X	X	X
>= 5 Circuits	X	X	X	X	X	X	X	X
No Dispatch								
< 5 Circuits	X	X	X	X	X	X	X	X
>= 5 Circuits	X	X	X	X	X	X	X	X

LOCAL INTERCONNECTION TRUNKS	0-5	6-10	11-15	16-20	21-25	26-30	>30	Average Completion Interval
	X	X	X	X	X	X	X	X

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RESALE DESIGN	0 - 5	6 - 10	11 - 15	16 - 20	21 - 25	26 - 30	> 30	Average Completion Interval
Dispatch								
CLEC orders								
< 10 Circuits	X	X	X	X	X	X	X	X
>= 10 Circuits	X	X	X	X	X	X	X	X
BST orders								
< 10 Circuits	X	X	X	X	X	X	X	X
>= 10 Circuits	X	X	X	X	X	X	X	X
No Dispatch								
CLEC orders								
< 10 Circuits	X	X	X	X	X	X	X	X
>= 10 Circuits								
BST orders								
< 10 Circuits	X	X	X	X	X	X	X	X
>= 10 Circuits	X	X	X	X	X	X	X	X

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Function:	<b>Held Order Interval Distribution and Mean Interval</b>
Measurement Overview:	When delays occur in completing CLEC orders, the average period that CLEC orders are held for BST reasons, pending a delayed completion, should be no worse for the CLEC when compared to BST delayed orders.
Measurement Methodology:	<p>1. Mean Held Order Interval = <math>\Sigma</math> (Reporting Period Close Date - Committed Order Due Date) / (Number of Orders Pending and Past The Committed Due Date) for all orders pending and past the committed due date.</p> <p>This metric is computed at the close of each report period. The held order interval is established by first identifying all orders, at the close of the reporting interval, that both have not been reported as "completed" via a valid completion notice and have passed the currently "committed completion date" for the order. <i>Held orders due to end-user reasons are included and identified in this report.</i> For each such order the number of calendar days between the committed completion date and the close of the reporting period is established and represents the held order interval for that particular order. The held order interval is accumulated by the standard groupings, unless otherwise noted, and the reason for the order being held, if identified. The total number of days accumulated in a category is then divided by the number of held orders within the same category to produce the mean held order interval.</p> <p>2. Held Order Distribution Intervals</p> <p>(# of Orders Held for <math>\geq 90</math> days) / (Total # of Orders Pending But Not Completed) X 100.</p> <p>(# of Orders Held for <math>\geq 15</math> days) / (Total # of Orders Pending But Not Completed) X 100.</p> <p>This "percentage orders held" measure is complementary to the held order interval but is designed to reflect orders continuing in a "non-completed" state for an extended period of time. Computation of this metric utilizes a subset of the data accumulated for the "held order interval" measure. All orders, for which the "held order interval" equals or exceeds 90 or 15 days are counted, unless otherwise noted as an exclusion. The total number of pending and past due orders are counted (as was done for the held order interval) and divided into the count of orders held past 90 or 15 days.</p> <p>Definition: Average time orders continue in a "non-complete" state for an extended period of time.</p> <p>Methodology:</p> <ul style="list-style-type: none"> <li>Mechanized metric from ordering system.</li> </ul>

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Reporting Dimensions:	Excluded Situations:
<ul style="list-style-type: none"> <li>CLEC Specific</li> <li>CLEC Aggregate</li> <li>BST Aggregate</li> <li>State, Regional and MSA<sup>6</sup> Level</li> </ul>	<ul style="list-style-type: none"> <li>Any order canceled by the CLEC will be excluded from this measurement.</li> <li>Order Activities of BST associated with internal or administrative use of local services.</li> </ul>
Data Retained Relating to CLEC Experience:	Data Retained Relating to BST Performance:
<ul style="list-style-type: none"> <li>Report Month</li> <li>CLEC Order Number</li> <li>Order Submission Date</li> <li>Committed Due Date</li> <li>Service Type</li> <li>Hold Reason</li> <li>State Region and MSA<sup>7</sup></li> </ul>	<ul style="list-style-type: none"> <li>Report Month</li> <li>Average Held Order Interval</li> <li>Standard Error for the Average Held Order Interval</li> <li>Service Type</li> <li>Hold Reason</li> <li>State Region and MSA<sup>8</sup></li> </ul>

**Held Order Interval Distribution and Mean Interval**

	60-15 Days				60-90 Days				Mean Interval
	Feature	Equip.	Other	End User Reasons	Feature	Equip.	Other	End User Reasons	
Local Interconnection Trunks	X	X	X	X	X	X	X	X	X
UNE Non Design	X	X	X	X	X	X	X	X	X
UNE Design	X	X	X	X	X	X	X	X	X
Retail - Residence	X	X	X	X	X	X	X	X	X
Retail - Business	X	X	X	X	X	X	X	X	X
Retail - Design	X	X	X	X	X	X	X	X	X
UNE - Loops w/LNP	X	X	X	X	X	X	X	X	X
BST Retail Residence	X	X	X	X	X	X	X	X	X
BST Retail Business	X	X	X	X	X	X	X	X	X
BST Retail Design	X	X	X	X	X	X	X	X	X

<sup>6</sup> Ibid.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

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Function:	Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notice.
Measurement Overview:	When BST can determine in advance that a committed due date is in jeopardy it will provide advance notice to the CLEC. There is no equivalent BST analog for Average Jeopardy & Percent Orders Given Jeopardy Notices.
Measurement Methodology:	<p>1. Average Jeopardy Interval = <math>(\Sigma (\text{Date and Time of Scheduled Due Date on Service Order}) - (\text{Date and Time of Jeopardy Notice})) / (\text{Number of Orders in Jeopardy in Reporting Period})</math>.</p> <p>2. Numbers of Orders Given Jeopardy Notices in Reporting Period/Number of Orders in Reporting Period.</p>

Reporting Dimensions:	Excluded Situations:
<ul style="list-style-type: none"> <li>CLEC Specific</li> <li>CLEC Aggregate</li> <li>State, Regional and MSA<sup>9</sup> Level</li> </ul>	<ul style="list-style-type: none"> <li>Any order canceled by the CLEC will be excluded from this measurement</li> <li>Orders held for CLEC end user reasons</li> </ul>
Data Retained Relating to CLEC Experience:	Data Retained Relating to BST Performance:
<ul style="list-style-type: none"> <li>Report Month</li> <li>CLEC Order Number</li> <li>Order Submission Date</li> <li>Committed Due Date</li> <li>Service Type</li> </ul>	<ul style="list-style-type: none"> <li>No BST Analog Exists</li> </ul>

Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notice.

	Average Interval of Prior Notification (Hours)	Percent Orders in Jeopardy
<b>CLEC</b>		
Local Interconnection Trunks	X	X
Resale Residence	X	X
Resale Business	X	X
Resale Design	X	X
UNE Loops with LNP	X	X
UNE	X	X

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<sup>9</sup> Ibid.

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Function:	Installation Timeliness, Quality & Accuracy
Measurement Overview:	The "percent missed installation appointments" measure monitors the reliability of BST commitments with respect to committed due dates to assure that CLECs can reliably quote expected due dates to their retail customer as compared to BST. Percent Provisioning Troubles within 30 d's of Installation measures the quality and accuracy of installation activities.
Measurement Methodology:	<p>1. Percent Missed Installation Appointments = <math>\Sigma (\text{Number of Orders missed in Reporting Period}) / (\text{Number of Orders Completed in Reporting Period}) \times 100</math></p> <p>Percent Missed Installation Appointments is the percentage of total orders processed for which BST is unable to complete the service orders on the committed due dates. <i>Missed Appointments caused by end-user reasons will be included and reported separately.</i></p> <p>Definition: Percent of orders where completion's are not done by due date. See "Exclude Situations" for orders not included in this measurement</p> <p>Methodology:</p> <ul style="list-style-type: none"> <li>Mechanized metric from ordering system</li> </ul> <p>2. % Provisioning Troubles within 30 days of Service Order Activity = <math>\Sigma (\text{Trouble reports on Services installed } \leq 30 \text{ days following service order(s) completion}) / (\text{All Service Orders in a calendar month}) \times 100</math></p> <p>Definition: Measures the quality and accuracy of completed orders</p> <p>Methodology:</p> <p>Mechanized metric from ordering and maintenance systems.</p>

<b>Reporting Dimensions:</b> <ul style="list-style-type: none"> <li>CLEC Specific</li> <li>CLEC Aggregate</li> <li>BST Aggregate</li> <li>State, Regional and MSA<sup>10</sup> Level</li> </ul>	<b>Excluded Situations:</b> <ul style="list-style-type: none"> <li>CLEC End User Reasons (Jeopardy Notification only)</li> <li>BST End User Reasons (Jeopardy Notification only)</li> <li>Orders canceled by the CLEC</li> <li>Order Activities of BST associated with internal or administrative use of local services.</li> </ul>
<b>Data Returned Relating to CLEC Experience:</b> <ul style="list-style-type: none"> <li>Report Month</li> <li>CLEC Order Number</li> <li>Order Submission Date</li> <li>Order Submission Time</li> <li>Status Type</li> <li>Status Notice Date</li> <li>Status Notice Time</li> <li>Standard Order Activity</li> <li>State Region and MSA<sup>11</sup></li> </ul>	<b>Data Returned Relating to BST Performance:</b> <ul style="list-style-type: none"> <li>Report Month</li> <li>BST Order Number</li> <li>Order Submission Date</li> <li>Order Submission Time</li> <li>Status Type</li> <li>Status Notice Date</li> <li>Status Notice Time</li> <li>Standard Order Activity</li> <li>State Region and MSA<sup>12</sup></li> </ul>

<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

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